Isolated Children's and Parents' Association of Queensland Inc.

Herein provides, on behalf of its members the,

Submission to the Australian Government's

Review into the Better Delivery of Universal Services Obligations.

1st March 2024

The Isolated Children's Parents' Association (Qld) Inc. represents the interests of over 1200 rural and remote Queensland families. The organisation consists of forty-five Branches throughout rural and remote Queensland and seeks to gain equitable access to educational opportunities for all rural and remote children. ICPA Qld thank the Department for Infrastructure, Transport, Regional Development, Communication and The Arts for the opportunity to present this submission.

ICPA Qld supports the fundamental principals of what a Universal Service provides to consumers. It is critical therefore that any amendment or future iteration of the USO continues to support those principals and safeguards the rights of every Australian to have ready and reliable access to fixed line and broadband services in a manner that reflects and addresses the limitations and challenges posed by Australia's vast geographic footprint and differing levels of available infrastructure and technologies. Therefore, ICPA Qld firmly believes the Universal Service Obligation for fixed line services must remain and indeed be strengthened and enforced more actively so that those who rely on it are not further disadvantaged and marginalised. This is essential to ensure equity of educational access and success.

ICPA Qld is firmly of the belief that all Australians regardless of cultural background, socio-economic status or location are entitled to reliable telecommunications and connectivity. Whilst acknowledging that this is not without its challenges in rural and remote Australia, it is a key tenet, to closing the gaps that tyranny of distance creates whilst offering innumerable opportunities to thrive and succeed in the place you choose to call home. Reliability and resilience are paramount to our members and to meeting their educational needs, whether they be undertaking learning via distance education or at a small school.

For the vast majority of our members fixed landlines and satellite internet are the only methods available to them to achieve connectivity. There is a misconception by many that access to mobile services exists across the length and breadth of Australia and is the default method for communication and internet access. This is blatantly incorrect and overlooks the technological divide faced by those living in geographically isolated areas. Across the continent, in areas where distance is vast and population is small and isolated, nbn, mobile and rapidly evolving digital technologies are simply not suitable and there are limited choices of service provision and provider.

The vast majority of those students undertaking their education, at home, by Distance Education (DE), would firmly fall into the 0.7% of Australians without mobile coverage as well as the 3% that rely on satellite internet statistical categories as do many small schools. The School Bandwidth upgrades to all schools in Qld has seen major improvements at the schools themselves. However, for students receiving their education at remote locations are not the beneficiaries of this upgrade as they are solely responsible for their connectivity options. This again highlights the disparity that remote families face when striving for equity in education.

Remote students rely heavily on telephones and internet to undertake their daily activities. Additionally, engagement with professional and peer support networks as well as administration tasks and with the Distance Education centre rely on these systems and landline in particular. When internet fails, as it often does in weather events, a landline is often the only method by which students can rely, interact with their peers, extracurricular activities and their teacher at the DE School both for daily lessons and for extra support. Until an equivalent reliable, accessible, user-

friendly alternative is available, current landline services must be maintained to allow students to continue to engage in their education successfully and meaningfully.

Additionally, when children are away at boarding school completing their compulsory education, families need to be able to contact their children regularly and reliably. With the well-publicised increase in mental health challenges for our young people, it is imperative that they be able to speak with their families without impediment. The current landlines with their standalone power system offer that security of contact and this is a further reason for the ongoing protection of a USO.

Our members, who undertake all or part of their learning via Distance Education, tell us that they are encouraged not to use Voice Over Internet Protocol (VOIP) when participating in their "on air" lessons with their fellow classmates. Latency and voice quality severely impact on lesson flow and outcomes particularly in classes that require clarity such as music, speech therapy, Language Other than English (LOTE). By and large this means using a landline to complete those lessons, possibly in conjunction with the computer. For geographically isolated students not only do these "on air" lessons provide learning time but also valuable social interaction with their peers.

This is why ICPA Qld is strongly of the view that a standalone landline system, independent of other technology or third party provided power source, must remain an option in rural and remote areas. To achieve educational equity and redress the vulnerabilities caused by geographic isolation, it is vital a robust, modern alternative to the current outdated systems be rolled out.

We understand that technology has much evolved over the years and, as such, acknowledge that it would be advantageous to use modes to deliver telecommunication and connectivity services underpinned by these modern technologies. New technologies must be proven, not just in theory but in practice, to match the reliability of old technology at the user's premises, prior to their implementation of services and the end user experience must be the key determinant when assessing alternative systems. However, we feel it imperative, that regardless of whatever mode/s and method/s are selected to deliver these services, they are supplied with supporting infrastructure no less than that currently assisting delivery into remote classrooms and small schools. The safety net of a USO must underpin these services as they currently stand and as they potentially evolve.

1.   **What do you consider are the key outcomes that a modern universal service framework should deliver?**

A modern universal service framework must deliver equity of service to all consumers. It must reflect the reality of conditions and circumstances in rural and remote Australia and support every person's right to access. Every Australian citizen must have the same connection access and experience regardless of location, financial standing, cultural association or needs as perceived by those external to the lived experience of the cohort of end users.

Flexible and Futuristic
The modernisation of service provision must be proven to match the reliability and user friendliness of current technology prior to transitioning new services for rural and remote people. Provision of evolving technologies must realistically and tangibly align with requirements of education, businesses, health as well as social connection expectations.

A modern framework must recognise that digital literacy remains a barrier to successful and effective uptake and utilisation of new and evolving technologies. Therefore, the foundation on which modernising the mode and method of available systems has to reflect this lowest common denominator of the end user demographic when rollout of any, and all, new systems occur. Improvement in digital literacy across rural and remote regions is imperative to enable optimal engagement and utilisation of modern systems and maximise the learning opportunities of those undertaking education from kindergarten through to university or apprenticeship courses.

Reliable

The Universal Service framework must support both quality and equity of access to fundamental community and individual education, health and emergency response services to rural and remote consumers and be a true metro comparable service.

New technologies must be proven, not just in theory but in practice, to match the reliability of old technology at the user's premises, prior to their implementation of services and the end user experience must be the key determinant when assessing alternative systems. Students, their schools, and staff must not have their connectivity and telecommunications methods, negatively impacted by a transition to technologies and services that do not deliver, at minimum, what is currently provided.

Extensive trialling is necessary across a variety of geography, climate, seasons, diverse cultural, socio economic and aged populations with extended timeframes in order to test the robustness, performance, useability, affordability, and reliability of any potential new systems. Additionally, the ability to maintain equipment and technology as well as access parts and equipment for maintenance reliably and efficiently also needs to be considered as part of any determination of future system rollout. Flexibility also needs to be a key tenet with the ability to adopt and adapt the continually evolving technology as it becomes available to ensure rural and remote communities do not continue to lag, or suffer an increased deficit, behind metropolitan services.

ICPA Qld members, require these systems not be reliant upon an external power source such as the national grid, generator or solar power provided by the customer at their cost. In much of rural and remote Australia the current landline systems are provided by solar powered battery systems provided and maintained by the service provider. Some exist in locations where there is no alternative power source readily available. It is vital that supply of an external power source is not transferred to the end user, as is the current status quo.

2. What safety-net services does a modern universal service framework need to address?

Safety and Reliability

ICPA Qld members are deeply concerned about safety and reliability of their fixed line and broadband services given the rapid evolution of technologies and educational expectations. Due to their rural and remote location, they are concerned that the yoke of distance and geography will see the gap between themselves and their urban and peri urban contemporaries widen and continue to lag, and possibly, suffer a growing disparity in the services they can utilise for their everyday needs.

Unlike most Australians, some rural and remote families heavily rely on the HCRC system, which all stakeholders concede is outdated and no longer reliable. However realistically, these consumers,

have very few tangible options and this is unlikely to change. It is therefore imperative that what is made available to this cohort is of a consistent and constant nature, readily and easily accessed and usable.

Vulnerability
It is especially important to note that for isolated families, in times of extreme disaster, there may be no physical access to any other humans or lines of communication for help. As part of any modernised framework, it is essential these premises be prioritised and classified as vulnerable. Additionally, appropriate measures must be put in place to ensure their options of communication be addressed as a priority.

In the 2023 catastrophic flooding event in the Gulf of Carpentaria region of Queensland, an exemption to meet service/repair times enshrined in the USO/CSG was applied by the service provider. This saw affected end users without fixed line services for up to three months which compromised their health, safety, business, and educational needs. These end users had to rely on wifi calling, which is problematic in wet weather due to cloud shading and UHF transmission, which has a limited footprint to meet their needs. Disappointingly, student learning was compromised as a result. A sunset clause must be enacted, and enforced, so that service providers don't take extended time to repair/replace equipment and re-establish services.

Power
Solar powered batteries, which supply the power, across northern Australia for much of the landline services have significantly reduced lifespan, performance and reliability due to extreme temperatures, prolonged weather events and animal incursion. They require continued and continual oversight to maintain optimal performance. Providers of systems are best placed to monitor these to ensure consistency and constancy of service and therefore need to be held responsible, by the USF, for provision and oversight of standalone power so that delivery and end user experience remains optimal. Further to this, the transfer of power cost to the end user will affect affordability for the customer. While service providers don't consider themselves "power providers" ICPA Qld believes it to be a little like selling a mobile phone without a battery attached. Additionally, as the technology expert they have the knowledge and expertise to determine when power systems are suboptimal and require maintenance/replacement and what equipment is best to utilise.

Diversity
At a minimum, two services across differing platforms with disconnect between the method and mode of delivery are required to provide not only reliable access and minimised disruption efficiently and effectively to everyday activities including education but also provide an adequate mantle of safety. A recognition that VOIP and voice services are not essentially the same thing and do not provide an equal and equitable experience must underwrite understanding of the aforementioned.

Additionally, it needs to be recognised that a one size fits all approach to telecoms and connectivity is not necessarily the best. Innovative, adaptive, and diverse systems need to be supplied to meet the specific needs of rural, regional, and remote communities. A Universal Service Framework must also adopt the same flexibility and recognise this requirement.

3. To what extent do you consider mobile services are important to complement fixed services supported under the existing framework?

While national statistics have noted rapid improvements in the reported accessibility to the mobile network there are limited statistics that single out rural and remote connection improvements. It is imperative that datasets representing the rural and remote demographic are extracted to paint a clearer picture.

By and large, our remote and rural members have at best, minimal, and (for the majority) at worst no mobile coverage. The only way they can access mobile coverage is via wifi over, quite often a satellite provided broadband service. ICPA Qld, is concerned, that by moving both telecoms and broadband services to the same mode and method of delivery we are actually lessening the platforms and the safety net that comes from having a diverse range of options available. Many customers may not have the digital literacy required to understand that the combining of these should a power outage or service failure occur will render them without either service. This lack of understanding presents a potentially severe impact on the daily learning of students in isolated schoolrooms or small rural and remote schools where phones and internet are an integral part of their school day.

Reachability is an expectation that has been bestowed globally and rural and remote areas are no exception to this. Given rural and remote citizens are the highest contributing demographic to the Gross Domestic Product of Australia it would be reasonable to appropriately mirror the financial contributions to the people and areas that produce such wealth. The lagging development in rural and remote areas in comparison to urban areas handicaps every level of existence, from education to attraction and retention of employees, to business development and innovation.

ICPA Qld would also propose that where government funding is obtained to provide additional coverage, such as through the Mobile Black Spot Funding initiative, that a Universal Service Framework apply to these services to ensure their adequate maintenance and upgrading as new technologies emerge. In this way, the taxpayers of Australia, are delivered a more robust product and better value and return for their investment into infrastructure that delivers a commercial benefit to the recipient of the funding.

In order to identify potential locations for the expansion of mobile coverage, ICPA Qld would encourage:

- The use of local knowledge and the input from all three tiers of government to identify areas where installation of mobile would be valued and valuable
- The prioritisation of areas where schools would benefit from coverage to replace their current reliance of satellite for delivering parts of their key learning areas such as Language Other Than English (LOTE)
- Key locations along roads that experience heavy traffic and high traffic, and which are used by school buses to transport children to school each day to improve their safety and wellbeing

As part of the overall integrity of mobile systems, more checks and balances need to be instigated to ensure the equipment- and hardware is operating at optimum. It is often only during times of emergency or natural disaster, that awareness of battery life and condition arises and, of course, access to then repair and/or replace components is compromised, meaning when a system is needed most it fails and fails for longer.

Regardless of if families reside under a mobile footprint, it is still an expectation that they possess a mobile phone. In this age of fraudulent practices, much use is made of SMS codes for authentication. Indeed, many businesses and even government agencies require a mobile number to progress through their systems. Again, rural, and remote families suffer from the misconception that mobile coverage is everywhere, and everyone has the ability and equipment to effectively engage via mobile platforms.

ICPA Qld acknowledges that, realistically, mobile coverage is not possible over all of Australia. However, it believes that significant investment must continue to be made in rural and remote areas to extend service provision given the national, and global, trends towards mobile as a default tool for connectivity, business, and connection.

4. Which existing requirements under the current universal service framework should be retained, or changed?

Quite simply, ICPA Qld believes that a standalone, independent power source installed, maintained, and upgraded by the service provider must be maintained. At least One line of communication must not be reliant on someone being able to start the generator or having a backup power system in place. To continue to explore opportunities down the path of external power source provision will, potentially, negatively impact upon the successful delivery of the everyday learning of students and the schools and teachers who provide that.

In addition, affordability and easy to use systems, having regard to the lowest level of digital literacy and confidence, must also be retained.

Automatic provision of handsets by the service provider was once the standard but this is no longer the case. Handsets for making phone calls must also be supplied but should be those that require no external power source. These are hard to source and are no longer offered by the service provider responsible for the majority of landline services in rural and remote areas

Until an alternative system is readily available across the rural and remote footprint, the USO, the Copper Continuity Obligation and the Customer Service Guarantee must not only all remain but be strengthened and enforced to protect the rights of end users to an affordable, accessible system that meets their needs and circumstances.

Performance benchmarks need to be set at a level that reflects the real populations in rural and remote regions. The current benchmark of 100 000 customers to trigger benchmarking means many providers to rural and remote regions would never have their performance scrutinised.

Priority Assistance to those with diagnosed conditions must remain and be enforced. Exemption to mandated repair timeframes due to natural disasters and other issues with similar impact should not be able to be applied to Priority Assistance customers.

Additionally, sufficient evaluation and investigation must be undertaken of providers seeking to enter the telecommunications and connectivity industry to ensure they have the full gamut of resources required to sustain quality and continual service delivery to the end user.

Carrier licence provisions must continue to apply to Telstra and should be extended to all licenced carriers. Additionally, the CSG obligations should also be extended to all carriers of fixed line and broadband services.

5. What role do you consider payphones should play in a modern universal service framework?

Whilst not used for education purposes, the move to free "pay phones" has been notably appreciated and well utilised and ICPA Qld is in support of their ongoing availability. As they widen the umbrella of communication tools available in rural and remote communities where they currently exist, they should be covered under the USO as are fixed landlines.

6. How should affordability be considered?

It is widely promoted that more than one connection is recommended to ensure security and continuity of education. However, some families are making decisions under financial duress and others are ill informed when choosing to elect a single service that provides their phone and internet. Families are choosing this option as they view it as cost saving, however when this service is faulty the household is without ANY line of communication.

It is the collective fiscal responsibility of having to sustain at 3 sources of communication that can be burdensome to families. It is though, not optional, as all readily available systems in rural and remote have an innate fragility based on the factors external to familial control. Weather, location, extended time frames to repair/replace due to a lack of qualified personnel, distance and access to parts and equipment all play a role in that fragility.

The same baseline of affordability should apply regardless of location. We, however, believe affordability to be more than just a price point, it must also reflect the reliability and fit for purpose of a service.

The Regional Tech Hub. The one stop shop that offers objective and detailed information about all service providers of telecommunications and broadband services and their plans is simply and clearly listed should be retained and promoted. Often people when considering a service provider are influenced by local marketing and promotion at the time of their decision and later come to realise, they have not necessarily signed up for the best fit or value for their needs and circumstances.

7. How can a modern universal service framework deliver better outcomes and meet digital inclusion needs of First Nations Australians?

ICPA Qld represents every family living in rural and remote Queensland and we do not promote the singling out on a cultural or linguistic basis and believe that communication accessibility, affordability and literacy should be viewed as a need basis without differentiation. The USO should aim to close the gap in the digital divide and ICPA Qld urges a collective uplift to all demographics, whether it be elderly, remote or indigenous so all Australians receive the same minimum standards, without exception.

ICPA Qld once again urge that digital inclusion needs are assessed on a needs and requirement criteria and not on population demographics such as race or culture.

Conclusion

Every Australian student and their families are, by being an Australian Citizen, entitled to equitable access to educational opportunities and the Universal Services Obligation must reflect and support this access. It is imperative that a reliable, affordable, agile service continue to be made available and that it be one of high quality, futuristic, fit for purpose and location.

Rural and remote residents and businesses should not be exempt from the globally accepted and expected standards of contactability and connectability. Multifaceted approaches to communication services are critical to providing continuity and reliability in receiving one's education. It is paramount that voice and voice over internet services are not perceived as one and the same and equal in quality and reliability and that rural and remote families are not financially disadvantaged by the burden of maintaining the necessary multiple lines of communication.

ICPA Qld believes, the Universal Services Obligation should close the gap for each and every rural and remote student by classifying rural and remote locations as technologically vulnerable, particularly where they are outside of a mobile footprint.

For rural and remote families, the continuum of experienced disparity in telecommunication and connectivity disadvantage, compared to their metropolitan counterparts, exacerbated by a paucity of fit for purpose connections and extended repair times and a failure to adapt and adopt innovative, agile, capable technologies, continues to grow. This deficit must not continue to be bestowed upon rural and remote communities, students, and educational institutions and ICPA Qld seeks the protection and standards that a well-designed USO can provide to address this disadvantage.